

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 16 CR 793
v.	)	
	)	Judge Andrea R. Wood
MICHAEL PERSAUD	)	

**MOTION OF THE UNITED STATES FOR ENTRY OF A  
FINAL ORDER OF ABANDONMENT**

The UNITED STATES OF AMERICA, through JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for entry of a final order of abandonment pursuant to 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, and in support thereof submits the following:

1. On December 8, 2016, an indictment was returned charging defendant Michael Persaud with wire fraud, in violation of 18 U.S.C. § 1343.

2. During the investigation that led to the indictment in this case, law enforcement officers seized the following (“subject property”):

- a) a MacBook Air, model A1369, S/N: C02H60GCDRQ4, with power supply;
- b) a Dell Studio XPS, model PP35L, S/N: 21F18J1 with power supply;
- c) an iMac, model A1419, S/N: D25N601YFLHH, with keyboard, mouse, and notepad; and
- d) a Dell Studio XPS, model 8000se, S/N: GR6YDK1.

3. On June 25, 2021, an agreement to defer prosecution was entered for twelve months for the purpose of allowing defendant Michael Persaud to demonstrate his good conduct during this period.

4. On June 30, 2022, this Court entered an order dismissing the indictment.

5. On August 4, 2022, pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, this Court entered a preliminary order of abandonment directing the United States to seize and take custody of the subject property which was seized during the course of this case. Additionally, the United States was ordered to publish notice of the United States' intention to forfeit the property and to dispose of it according to law.

6. Beginning on August 27, 2022, and continuing for three consecutive weeks ending on September 25, 2022, the United States published notice of its intention to forfeit the subject property on the following government internet web page: *www.forfeiture.gov*. A copy of the Declaration of Publication is attached as Government Exhibit A.

7. All ECF filers received a copy of the preliminary order of abandonment.

8. To date, no petitions have been filed requesting a hearing to adjudicate any interest in the foregoing property, and the time in which to do so has expired.

WHEREFORE, pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, the United States requests that this Court enter a final order of abandonment as to the subject property.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

*/s Sheri Mecklenburg*

By:

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